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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 BIT GLOBAL DIGITAL LIMITED,

17 Plaintiff,

18 v.

19 COINBASE GLOBAL, INC.,

20 Defendant.

21 Case No. 3:24-CV-09019-AMO

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CIVIL LOCAL RULE 7-12
STIPULATION AND [PROPOSED]
ORDER REGARDING
STAY OF DISCOVERY AND
CONTINUATION OF INITIAL CASE
MANAGEMENT CONFERENCE

Hon. Araceli Martínez-Olguín

1 Pursuant to Civil Local Rule 7-12, Defendant Coinbase Global, Inc. (“Coinbase”) and
2 Plaintiff BiT Global Digital, Ltd (“BiT Global”) hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff BiT Global filed the Complaint (Dkt. 1) on December 13, 2024;

4 WHEREAS, on December 13, 2024, the Court set the Initial Case Management Conference
5 for March 13, 2025 (Dkt. 11);

6 WHEREAS, the Complaint was served on Defendant Coinbase on December 16, 2024 (Dkt.
7 26);

8 WHEREAS, Coinbase has filed a motion to dismiss the complaint on January 21, 2025, BiT
9 Global’s opposition to the motion to dismiss is due February 18, 2025, and Coinbase’s reply in
10 support of its motion to dismiss is due March 4, 2025 (Dkt. 31);

11 WHEREAS, a hearing on the motion to dismiss has been noticed for April 3, 2025 (Dkt.
12 33), subject to the availability of the Court;

13 WHEREAS, the parties agree that good cause exists to stay discovery, including the
14 conference required by Federal Rule of Civil Procedure 26, and agree not to engage in any discovery
15 unless and until the Court rules that BiT Global has stated a claim upon which relief can be granted;

16 WHEREAS, because the parties’ agreement regarding the stay of discovery implicates the
17 extent to which case management is needed, the parties respectfully submit that the Case
18 Management Conference should be postponed until a date closer in time to when discovery will
19 open, if at all, pursuant to the parties’ agreement.

20 NOW, THEREFORE, IT IS STIPULATED AND AGREED SUBJECT TO THE COURT’S
21 APPROVAL:

- 22 • All discovery in this case is STAYED, including the conference required by Federal
23 Rule of Civil Procedure 26, unless and until the Court denies Defendant Coinbase
24 Global, Inc.’s motion to dismiss in whole or in part. In the event the Court grants the
25 motion to dismiss in its entirety, with leave to amend, discovery shall remain stayed
26 unless and until any subsequent motions to dismiss are resolved.
- 27 • The Case Management Conference shall be postponed until a date to be set by the
28 Court after Coinbase files its Answer.

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2 Dated: January 29, 2025

KNEUPPER & COVEY, PC

3 By: /s/ A. Cyclone Covey
A. CYCLONE COVEY

4 *Attorney for Plaintiff*
5 BiT Global Digital, Ltd.

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7 WILMER CUTLER PICKERING HALE AND
8 DORR LLP

9 By: /s/ Sonal N. Mehta
SONAL N. MEHTA

10 *Attorney for Defendant*
11 Coinbase Global, Inc.

ATTORNEY ATTESTATION

I, Sonal N. Mehta, am the ECF User whose ID and password are being used to file this stipulation. In compliance with Civil Local Rule 5-l(i)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory.

Dated: January 29, 2025

By: /s/ Sonal N. Mehta
Sonal N. Mehta**PURSUANT TO STIPULATION, IT IS SO ORDERED.**